

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO POPKIN INTERROGATORIES DBP/USPS-13 (a.-f.), 15, AND 17
(July 5, 2001)


DBP/USPS-13 - 17 were filed on June 21, 2001. On June 28, the Postal Service filed objections to questions 13-16, but also indicated that, without waiving its objections, it would provide answers to parts a.-f. of question 13, and to question 15. Each interrogatory is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Rate-making


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July 5, 2001

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF DAVID B. POPKIN**

DBP/USPS-13 Please refer to USPS-LR-2/C2001-1, [a] Confirm that the use of the entry "NR" indicates that the facility in question did not report for that date. [b] Confirm that an entry of "NR" could indicate that the facility in question did process mail on that date but did not report the data. [c] Confirm that the Postal Service has a practice where one facility will send its mail on a regular or irregular basis, such as on a Saturday or a holiday, to another facility in the area to process. [d] Confirm that the practice referred to in subpart c may also take place on an emergency basis such as recently occurred in the Houston area due to flooding. [e] Confirm that a facility that forwards its mail as noted in subparts b and c would then report 0.000 for its own facility. [f] Confirm that the mailers in the area covered by a facility which forwards its mail as noted in subparts b and c will still receive service on the day in question as if their own facility processed the mail rather than forwarding it. [g] Please provide a revised library reference USPS-LR-2/C2001-1 that utilizes a code, such as "FWD", to indicate those instances where the mail was forwarded to another facility to process. [h] Please explain any subparts that you are not able to confirm.

RESPONSE:

- a.-b. Confirmed.
- c. Confirmed that consolidated operations are conducted in some areas in some instances, and that such consolidated operations may occur on holidays.
- d.-f. Confirmed.
- g. Objection filed.

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DBP/USPS-15. Please refer to your response to DBP/USPS-6. Explain why there are no plans to revise the provisions of the DMM as they relate to Sunday and holiday service.

RESPONSE:

The focus of the response to DBP/USPS-6 was on the POM because it contains more numerous references to Sunday and holiday collection practice. Revision plans would be expected to include any revisions to the DMM necessary to make it consistent with the revised POM.

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DBP/USPS-17 Please refer to Library References USPS-LR-1/C2001-1 and USPS-LR-3/C2001-1 and to the responses to Interrogatories DFC/USPS-1-18. These documents contain various letters, memoranda, and other documents in which partial redactions of the document appear to have been performed on at least one of the documents. Please either *confirm that no redactions have been performed, provide unredacted documents in the cases where redaction was performed, or provide a listing of those documents which have had information redacted and the location of the redaction, the type of information that was redacted, and the reason for such redaction.* This also refers to any redaction that may have taken place with respect to complete pages of the document or its attachments.

RESPONSE:

The following redactions were made in materials supplied LR-3, in order to protect facility-specific information and, secondarily, to reduce the number of pages that needed to be copied:

President's Day

Jan 22, 1998	Remove attachment with facility specific volumes
Jan 30, 2001	"

Memorial Day

May 10, 1996	Redact names of facilities with plan failures
May 13, 1997	"
May 11, 1998	"
May 10, 1999	"

Fourth of July

June 17, 1996	Remove sheet with facility specific consolidation plans
June 10, 1997	"
June 16, 1998	Remove sheet with facility specific volumes

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Labor Day

Feb 10, 1995	Remove sheet with facility specific consolidation plans
Aug 6, 1996	"
Aug 18, 1998	"

Columbus Day

Sept 23, 1996	Remove sheet with facility specific volumes
Sept 22, 1997	"
Sept 21, 1998	Remove sheets with facility specific volumes
Sept 21, 1999	"
Sept 27, 2000	"

Veteran's Day

Oct 28, 1997	Redact names of facilities with plan failures
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The only redactions in other documents would have been to redact names and phone numbers of individuals.

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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